

DR. LEE L. SELWYN

Dr. Lee L. Selwyn has been actively involved in the telecommunications field for more than twenty-five years, and is an internationally recognized authority on telecommunications regulation, economics and public policy. Dr. Selwyn founded the firm of Economics and Technology, Inc. in 1972, and has served as its President since that date. He received his Ph.D. degree from the Alfred P. Sloan School of Management at the Massachusetts Institute of Technology. He also holds a Master of Science degree in Industrial Management from MIT and a Bachelor of Arts degree with honors in Economics from Queens College of the City University of New York.

Dr. Selwyn has testified as an expert on rate design, service cost analysis, form of regulation, and other telecommunications policy issues in telecommunications regulatory proceedings before some forty state commissions, the Federal Communications Commission and the Canadian Radio-television and Telecommunications Commission, among others. He has appeared as a witness on behalf of commercial organizations, non-profit institutions, as well as local, state and federal government authorities responsible for telecommunications regulation and consumer advocacy.

He has served or is now serving as a consultant to numerous state utilities commissions including those in Arizona, Minnesota, Kansas, Kentucky, the District of Columbia, Connecticut, California, Delaware, Maine, Massachusetts, New Hampshire, Vermont, New Mexico, Wisconsin and Washington State, the Office of Telecommunications Policy (Executive Office of the President), the National Telecommunications and Information Administration, the Federal Communications Commission, the Canadian Radio-television and Telecommunications Commission, the United Kingdom Office of Telecommunications, and the Secretaria de Comunicaciones y Transportes of the Republic of Mexico. He has also served as an advisor on telecommunications regulatory matters to the International Communications Association and the Ad Hoc Telecommunications Users Committee, as well as to a number of major corporate telecommunications users, information services providers, paging and cellular carriers, and specialized access services carriers.

Dr. Selwyn has presented testimony as an invited witness before the U.S. House of Representatives Subcommittee on Telecommunications, Consumer Protection and Finance and before the U.S. Senate Judiciary Committee, on subjects dealing with restructuring and deregulation of portions of the telecommunications industry.

In 1970, he was awarded a Post-Doctoral Research Grant in Public Utility Economics under a program sponsored by the American Telephone and Telegraph Company, to conduct research on the economic effects of telephone rate structures upon the computer time sharing industry. This work was conducted at Harvard University's Program on Technology and Society,

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where he was appointed as a Research Associate. Dr. Selwyn was also a member of the faculty at the College of Business Administration at Boston University from 1968 until 1973, where he taught courses in economics, finance and management information systems.

Dr. Selwyn has published numerous papers and articles in professional and trade journals on the subject of telecommunications service regulation, cost methodology, rate design and pricing policy. These have included:

“Taxes, Corporate Financial Policy and Return to Investors”
National Tax Journal, Vol. XX, No.4, December 1967.

“Pricing Telephone Terminal Equipment Under Competition”
Public Utilities Fortnightly, December 8, 1977.

“Deregulation, Competition, and Regulatory Responsibility in the Telecommunications Industry”
Presented at the 1979 Rate Symposium on Problems of Regulated Industries - Sponsored by: The American University, Foster Associates, Inc., Missouri Public Service Commission, University of Missouri-Columbia, Kansas City, MO, February 11 - 14, 1979.

“Sifting Out the Economic Costs of Terminal Equipment Services”
Telephone Engineer and Management, October 15, 1979.

“Usage-Sensitive Pricing” (with G. F. Borton)
(a three part series)
Telephony, January 7, 28, February 11, 1980.

“Perspectives on Usage-Sensitive Pricing”
Public Utilities Fortnightly, May 7, 1981.

“Diversification, Deregulation, and Increased Uncertainty in the Public Utility Industries”
Comments Presented at the Thirteenth Annual Conference of the Institute of Public Utilities, Williamsburg, VA - December 14 - 16, 1981.

“Local Telephone Pricing: Is There a Better Way?; The Costs of LMS Exceed its Benefits: a Report on Recent U.S. Experience.”
Proceedings of a conference held at Montreal, Quebec - Sponsored by Canadian Radio-Television and Telecommunications Commission and The Centre for the Study of Regulated Industries, McGill University, May 2 - 4, 1984.

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"Long-Run Regulation of AT&T: A Key Element of A Competitive Telecommunications Policy"

Telematics, August 1984.

"Is Equal Access an Adequate Justification for Removing Restrictions on BOC Diversification?"

Presented at the Institute of Public Utilities Eighteenth Annual Conference, Williamsburg, VA - December 8 - 10, 1986.

"Market Power and Competition Under an Equal Access Environment"

Presented at the Sixteenth Annual Conference, "Impact of Deregulation and Market Forces on Public Utilities: The Future Role of Regulation"
Institute of Public Utilities, Michigan State University, Williamsburg, VA - December 3 - 5, 1987.

"Contestable Markets: Theory vs. Fact"

Presented at the Conference on Current Issues in Telephone Regulations: Dominance and Cost Allocation in Interexchange Markets - Center for Legal and Regulatory Studies Department of Management Science and Information Systems - Graduate School of Business, University of Texas at Austin, October 5, 1987.

"The Sources and Exercise of Market Power in the Market for Interexchange Telecommunications Services"

Presented at the Nineteenth Annual Conference - "Alternatives to Traditional Regulation: Options for Reform" - Institute of Public Utilities, Michigan State University, Williamsburg, VA, December, 1987.

"Assessing Market Power and Competition in The Telecommunications Industry: Toward an Empirical Foundation for Regulatory Reform"

Federal Communications Law Journal, Vol. 40 Num. 2, April 1988.

"A Perspective on Price Caps as a Substitute for Traditional Revenue Requirements Regulation"

Presented at the Twentieth Annual Conference - "New Regulatory Concepts, Issues and Controversies" - Institute of Public Utilities, Michigan State University, Williamsburg, VA, December, 1988.

"The Sustainability of Competition in Light of New Technologies" (with D. N. Townsend and P. D. Kravtin)

Presented at the Twentieth Annual Conference - Institute of Public Utilities Michigan State University, Williamsburg, VA, December, 1988.

Dr. Lee L. Selwyn (continued)

"Adapting Telecom Regulation to Industry Change: Promoting Development Without Compromising Ratepayer Protection" (with S. C. Lundquist)
IEEE Communications Magazine, January, 1989.

"The Role of Cost Based Pricing of Telecommunications Services in the Age of Technology and Competition"
Presented at National Regulatory Research Institute Conference, Seattle, July 20, 1990.

"A Public Good/Private Good Framework for Identifying POTS Objectives for the Public Switched Network" (with Patricia D. Kravtin and Paul S. Keller)
Columbus, Ohio: *National Regulatory Research Institute*, September 1991.

"Telecommunications Regulation and Infrastructure Development: Alternative Models for the Public/Private Partnership"
Prepared for the Economic Symposium of the International Telecommunications Union Europe Telecom '92 Conference, Budapest, Hungary, October 15, 1992.

"Efficient Infrastructure Development and the Local Telephone Company's Role in Competitive Industry Environment" *Presented at the Twenty-Fourth Annual Conference, Institute of Public Utilities, Graduate School of Business, Michigan State University, "Shifting Boundaries between Regulation and Competition in Telecommunications and Energy"*, Williamsburg, VA, December 1992.

"Measurement of Telecommunications Productivity: Methods, Applications and Limitations" (with Françoise M. Clottes)
Presented at Organisation for Economic Cooperation and Development, Working Party on Telecommunication and Information Services Policies, '93 Conference "Defining Performance Indicators for Competitive Telecommunications Markets", Paris, France, February 8-9, 1993.

"Telecommunications Investment and Economic Development: Achieving efficiency and balance among competing public policy and stakeholder interests"
Presented at the 105th Annual Convention and Regulatory Symposium, National Association of Regulatory Utility Commissioners, New York, November 18, 1993.

"The Potential for Competition in the Market for Local Telephone Services" (with David N. Townsend and Paul S. Keller)
Presented at the Organization for Economic Cooperation and Development Workshop on Telecommunication Infrastructure Competition, December 6-7, 1993.

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"Market Failure in Open Telecommunications Networks: Defining the new natural monopoly," *Utilities Policy*, Vol. 4, No. 1, January 1994.

The Enduring Local Bottleneck: Monopoly Power and the Local Exchange Carriers, (with Susan M. Gately, et al) a report prepared by ETI and Hatfield Associates, Inc. for AT&T, MCI and CompTel, February 1994.

Commercially Feasible Resale of Local Telecommunications Services: An Essential Step in the Transition to Effective Local Competition, (Susan M. Gately, et al) a report prepared by ETI for AT&T, July 1995.

"Efficient Public Investment in Telecommunications Infrastructure" *Land Economics*, Vol 71, No.3, August 1995.

Funding Universal Service: Maximizing Penetration and Efficiency in a Competitive Local Service Environment, Lee L. Selwyn with Susan M. Baldwin, under the direction of Donald Shephard, A Time Warner Communications Policy White Paper, September 1995.

Stranded Investment and the New Regulatory Bargain, Lee L. Selwyn with Susan M. Baldwin, under the direction of Donald Shephard, A Time Warner Communications Policy White Paper, September 1995

"Market Failure in Open Telecommunications Networks: Defining the new natural monopoly," in *Networks, Infrastructure, and the New Task for Regulation*, by Werner Sichel and Donal L. Alexander, eds., University of Michigan Press, 1996.

Establishing Effective Local Exchange Competition: A Recommended Approach Based Upon an Analysis of the United States Experience, Lee L. Selwyn, paper prepared for the Canadian Cable Television Association and filed as evidence in Telecom Public Notice CRTC 95-96, Local Interconnection and Network Component, January 26, 1996.

The Cost of Universal Service, A Critical Assessment of the Benchmark Cost Model, Susan M. Baldwin with Lee L. Selwyn, a report prepared by Economics and Technology, Inc. on behalf of the National Cable Television Association and submitted with Comments in FCC Docket No. CC-96-45, April 1996.

Economic Considerations in the Evaluation of Alternative Digital Television Proposals, Lee L. Selwyn (as Economic Consultant), paper prepared for the Computer Industry Coalition on Advanced Television Service, filed with comments in FCC MM Docket No. 87-268, In the Matter of Advanced

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Television Systems and Their Impact Upon the Existing Television Broadcast Service, July 11, 1996.

Assessing Incumbent LEC Claims to Special Revenue Recovery Mechanisms: Revenue opportunities, market assessments, and further empirical analysis of the "Gap" between embedded and forward-looking costs, Patricia D. Kravtin and Lee L. Selwyn, In the Matter of Access Charge Reform, in CC Docket No. 96-262, January 29, 1997.

The Use of Forward-Looking Economic Cost Proxy Models, Susan M. Baldwin and Lee L. Selwyn, Economics and Technology, Inc., February 1997.

The Effect of Internet Use On The Nation's Telephone Network, Lee L. Selwyn and Joseph W. Laszlo, a report prepared for the Internet Access Coalition, July 22, 1997.

Regulatory Treatment of ILEC Operations Support Systems Costs, Lee L. Selwyn, Economics and Technology, Inc., September 1997.

The "Connecticut Experience" with Telecommunications Competition: A Case in Getting it Wrong, Lee L. Selwyn, Helen E. Golding and Susan M. Gately, Economics and Technology, Inc., February 1998.

Where Have All The Numbers Gone?: Long-term Area Code Relief Policies and the Need for Short-term Reform, prepared by Economics and Technology, Inc. for the Ad Hoc Telecommunications Users Committee, International Communications Association, March 1998.

Broken Promises: A Review of Bell Atlantic-Pennsylvania's Performance Under Chapter 30, Lee L. Selwyn, Sonia N. Jorge and Patricia D. Kravtin, Economics and Technology, Inc., June 1998.

Building A Broadband America: The Competitive Keys to the Future of the Internet, Lee L. Selwyn, Patricia D. Kravtin and Scott A. Coleman, a report prepared for the Competitive Broadband Coalition, May 1999.

Bringing Broadband to Rural America: Investment and Innovation In the Wake of the Telecom Act, Lee L. Selwyn, Scott C. Lundquist and Scott A. Coleman, a report prepared for the Competitive Broadband Coalition, September 1999.

Dr. Selwyn has been an invited speaker at numerous seminars and conferences on telecommunications regulation and policy, including meetings and workshops sponsored by the National Telecommunications and Information Administration, the National Association of

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Regulatory Utility Commissioners, the U.S. General Services Administration, the Institute of Public Utilities at Michigan State University, the National Regulatory Research Institute at Ohio State University, the Harvard University Program on Information Resources Policy, the Columbia University Institute for Tele-Information, the International Communications Association, the Tele-Communications Association, the Western Conference of Public Service Commissioners, at the New England, Mid-America, Southern and Western regional PUC/PSC conferences, as well as at numerous conferences and workshops sponsored by individual regulatory agencies.

Attachment 2:

**Verizon New Jersey responses to
Data Requests
Referred to in this Declaration**

Verizon NJ response to RPA-26
Verizon NJ response to RPA-27
Verizon NJ response to RPA-71
Verizon NJ response to RPA-72
Verizon NJ response to RPA-73
Verizon NJ response to RPA-74

VERIZON NEW JERSEY INC.
BPU DOCKET NO. TO01090541
RATEPAYER ADVOCATE REQUEST #26
WITNESS: VERIZON NEW JERSEY INC.

- REQUEST: Attachment 101 footnote 3 states, "each E911 subscriber listing necessarily represents one customer access line, but may represent more than a single line."
- a. Who is responsible for maintaining the E911 database?
 - b. Define "lines" as used in the context of this footnote.
 - c. Provide the total number of "lines" from all sources that are included in the E911 database, and indicate the quantity of "lines" associated with each source.
 - d. Provide the documents or other source materials used by the witness to determine CLEC practices for entering DID numbers into the E911 database.
 - i. Do CLECs include all numbers in a DID number block assigned to a customer?
 - ii. Do CLECs include CLEC numbers "ported" back to Verizon NJ (and which retain the CLEC's NXX code)?
 - e. Paragraph 8 states, "Based on E911 listing, competitors are serving at least 280 residential lines using their own facilities."
 - i. Identify and provide the number of CLECs serving residential lines using their own facilities.
 - ii. Identify and provide the number of CLECs serving residential customers using UNE platforms. Provide a breakout for of this figure by type of UNE employed by the CLEC.
 - iii. Explain the discrepancy between the number of facilities based residential CLEC access lines as stated in paragraph 8 (280) and the number of residential directory listing found in Table 2 of Attachment 101 (380).
 - iv. Provide all source data used or relied upon by Verizon New Jersey to develop the E911-based figures provided in Mr. Bone's declaration.
 - f. Paragraph 9 states, "The quantity of numbers ported using long-term number portability has increased from about 12,300 at the end of 1998 to approximately 224,700 as of June 2001." Provide:

- i. The quantity of numbers ported from Verizon NJ to CLECs by month from the end of 1998.
- ii. The quantity of numbers ported from CLECs to Verizon NJ by month from the end of 1998.?

RESPONSE:

- a. Verizon NJ maintains the E911 database.
- b. Exchange access lines
- c. As explained in footnote 3 of Attachment 101 of Mr. Bone's declaration, Verizon NJ cannot determine the total number of lines represented by the number of E911 listings. As of end of June 2001, there were a total of approximately 7,186,000 Verizon NJ retail listings, 195,200 Verizon NJ listings for CLEC resale and unbundled switching customers, and 288,000 listings for CLEC facility-based customers listings in the E911 database.
- d. Verizon NJ has made no determination of CLEC practices for entering DID numbers into the E911 database. Verizon NJ does not know whether CLECs include in their E-911 listings all numbers in a DID number block assigned to a customer. CLECs do not include in their E911 listings the CLEC numbers that have been ported back to Verizon NJ.
- e.

1. Verizon NJ objects to this request to the extent that it seeks CLEC-specific data which is customer proprietary to each CLEC. Subject to this objection, Verizon NJ responds as follows: Based on E911 listings, the following 8 CLECs are serving residential customers using their own facilities.

[BEGIN CLEC PROPRIETARY]

[END CLEC PROPRIETARY]

- ii. Verizon NJ objects to this request to the extent that it seeks CLEC-specific data which is customer proprietary to each CLEC. Subject to this objection, Verizon NJ responds as follows: The following 10 CLECs are serving residential customers using UNE-Platform.

[BEGIN CLEC PROPRIETARY]

[END CLEC PROPRIETARY]

- iii. The number of facilities based residential CLEC access lines is based on CLEC listings in the E911 database, which is different from the count of residential facilities based directory listings. Any discrepancy is due to the listings provided by the CLECs.
- iv. Verizon NJ objects to this request to the extent that it seeks CLEC-specific data which is customer proprietary to each CLEC; and on the grounds that it is unduly burdensome and is not reasonably designed to lead to the discovery of relevant evidence. Subject to this objection, Verizon NJ responds as follows: See Verizon NJ's responses to Ratepayer Advocate requests # 17 and 20.
 - f.
 - (i) Please see Attachment RPA-26iatt.doc
 - (ii) Please see Attachment RPA-26iiatt.doc

Attachment RPA-26iatt.doc

26.f.i: TNs Ported from Verizon NJ to CLECs

TNs Ported to
CLECs

| | Jan | Feb | Mar | Apr | May | Jun | Jul |
|------|--------|--------|--------|--------|--------|--------|--------|
| 1998 | | | | | | | 112 |
| 1999 | 14124 | 17161 | 20182 | 23595 | 26197 | 30524 | 33575 |
| 2000 | 76163 | 79871 | 82711 | 87269 | 92294 | 105503 | 107631 |
| 2001 | 160843 | 165407 | 184032 | 191665 | 211570 | 224737 | 235548 |

| Aug | Sep | Oct | Nov | Dec |
|--------|--------|--------|--------|--------|
| 2140 | 3184 | 9219 | 11342 | 12279 |
| 36711 | 39654 | 47588 | 57248 | 72935 |
| 112913 | 114389 | 120204 | 132758 | 139946 |

Attachment RPA-26iiatt.doc

26.f.ii: TNs ported from CLECs to Verizon NJ

TNs Ported In to Verizon

| | Jan | Feb | Mar | Apr | May | Jun | Jul |
|------|------|------|------|------|------|------|------|
| 1998 | | | | | | | |
| 1999 | 0 | 2 | 17 | 17 | 22 | 23 | 24 |
| 2000 | 1085 | 1785 | 1785 | 1785 | 1786 | 1796 | 1795 |
| 2001 | 1878 | 1878 | 2032 | 2049 | 2076 | 2462 | 4498 |

| Aug | Sep | Oct | Nov | Dec |
|------|------|------|------|------|
| | | | | 0 |
| 25 | 23 | 24 | 25 | 1025 |
| 1800 | 1800 | 1808 | 1829 | 1852 |

VERIZON NEW JERSEY INC.
BPU DOCKET NO. TO01090541
RATEPAYER ADVOCATE REQUEST #27
WITNESS: VERIZON NEW JERSEY INC.

REQUEST: Regarding the Declaration of Dennis M. Bone:

- a. Paragraph 6 states "CLECs have more than 1,000 existing completed collocation arrangements and 90 collocation arrangements in progress:
 - i. Provide the total number of completed collocation arrangements cited in paragraph 6 with Verizon NJ collocation accounts currently in arrears.
 - ii. Designate the number of these accounts belonging to companies currently operating under Chapter 11 or under any other form of bankruptcy or receivership.
 - iii. Indicate the number of pending disconnect orders for collocation arrangements.
 - iv. Indicate the number of collocation arrangements with disconnect orders that are currently in arrears.
- b. Regarding paragraph 6, "CLECs have obtained approximately 1,300 NXX codes in New Jersey, representing a total of about 13 million telephone numbers." Indicate the total number of telephone numbers from these NXX codes that are associated with actual CLEC retail customers through June 2001.

RESPONSE:

- a)
 - i. Currently there are 232 collocation arrangements that are at least 30 days in arrears.
 - ii. There are 9 companies that have filed for bankruptcy or some form of receivership and also have accounts in the arrears
 - iii. There are 391 pending disconnects.
 - iv. None of the pending disconnect orders are currently in arrears.
- b) Verizon NJ does not have this information. It is known to the CLECs.

VERIZON NEW JERSEY INC.
BPU DOCKET NO. TO01090541
RATEPAYER ADVOCATE REQUEST #71
WITNESS: VERIZON NEW JERSEY INC.

REQUEST: Please provide the following information:

- a. Documents, correspondence, memoranda, business plans, marketing plans, forecasts, sales targets, and any and all other written materials including electronic as well as conventional paper correspondence and documents pertaining to the sales and marketing activities expected to be carried out jointly between Verizon NJ and Verizon Long Distance and/or by Verizon NJ on behalf of or for the benefit of Verizon Long Distance with respect to the acquisition of residential and small business customers following receipt of FCC authorization to provide interLATA services in New Jersey.
- b. The number, or an estimate of this number if an actual is not available, of incoming calls received by all Verizon New Jersey customer service functions (including but not limited to customer service, billing, and repair representatives) from its customers during the calendar years 1999, 2000, and an estimated number for 2001.
- c. The estimated percentage of Verizon NJ customers that will be obtained via Verizon NJ through joint marketing of local and long distance service, in the first and fifth years after Verizon Long Distance is authorized to provide long distance service in New Jersey.
- d. The number of Verizon Long Distance customer service representatives employed by Verizon Long Distance on January 1, 2001 and the number of customer service representatives planned to be employed when Verizon Long Distance is authorized to provide long distance service in New Jersey and provide planning materials relied on to arrive at the budgeted headcount.
- e. Describe and provide all materials used for training Verizon NJ customer service representatives to handle Verizon Long Distance service inquiries and orders for long distance service.

- f. Describe and provide all documents pertaining to the manner in which the costs of Verizon NJ's participation in joint marketing with Verizon Long Distance will be identified and allocated to Verizon Long Distance. Indicate specifically how such costs are to be tracked, how common overhead costs will be allocated, and the specific accounting transactions or payment mechanisms that will be used to compensate Verizon NJ for any and all sales, marketing or other services it furnishes to Verizon Long Distance.
- g. The compensation to be paid to Verizon NJ for each sale of Verizon Long Distance service by a Verizon representative.
- h. The compensation to be paid to a Verizon NJ representative for each sale of Verizon Long Distance service by that representative. Please specify whether the compensation received by an individual representatives will in the form of money, other goods and services, or other in-kind compensation.
- i. Explain how the sales of Verizon Long Distance services by Verizon NJ representatives will be monitored and tabulated by Verizon NJ, and how individual Verizon NJ representative's sales of Verizon Long Distance services will be monitored for compensation purposes.

RESPONSE: Verizon NJ objects to this request (and all subparts) on the ground that it is not relevant to this proceeding or reasonably calculated to lead to the discovery of information relevant to the Board's consideration of Verizon's 271 Checklist Compliance in New Jersey. Verizon further objects on the grounds that this request is overly broad and unduly burdensome. Notwithstanding its objections, Verizon states that much of the information requested in this interrogatory has not yet been prepared or determined for the New Jersey LD market.

VERIZON NEW JERSEY INC.
BPU DOCKET NO. TO01090541
RATEPAYER ADVOCATE REQUEST #72
WITNESS: VERIZON NEW JERSEY INC.

REQUEST: Provide the same information as requested in item (5) for Verizon New York and Verizon Massachusetts following those affiliates' respective entry into the in-region interLATA long distance market pursuant to Section 271 approval by the FCC.

RESPONSE: Verizon NJ objects to this request on the ground that it is not relevant to this proceeding or reasonably calculated to lead to the discovery of information relevant to the Board's consideration of Verizon's 271 Checklist Compliance in New Jersey. Verizon further objects on the grounds that this request is overly broad and unduly burdensome.

VERIZON NEW JERSEY INC.
BPU DOCKET NO. TO01090541
RATEPAYER ADVOCATE REQUEST #73
WITNESS: VERIZON NEW JERSEY INC.

REQUEST: Provide copies of all marketing scripts, both draft and final, that Verizon NJ representatives will use to jointly market Verizon Long Distance services. For each script, identify the customer category for which it will be used. For purposes of example only and not to limit the response to these categories, this would include scripts for (i) marketing to new customers calling to subscribe to local exchange service, (ii) marketing to existing customers calling to change or add a service, (iii) marketing to existing customers calling to change their long distance service, (iv) marketing to existing customers calling with service or billing inquiries, or (v) marketing to customers calling with a service trouble report or inquiry.

RESPONSE: Verizon NJ objects to this request (and all subparts) on the ground that it is not relevant to this proceeding or reasonably calculated to lead to the discovery of information relevant to the Board's consideration of Verizon's 271 Checklist Compliance in New Jersey. Verizon further objects on the grounds that this request is overly broad and unduly burdensome. Notwithstanding its objections, Verizon states that much of the information requested in this interrogatory has not yet been prepared or determined for the New Jersey LD market.

VERIZON NEW JERSEY INC.
BPU DOCKET NO. TO01090541
RATEPAYER ADVOCATE REQUEST #74
WITNESS: VERIZON NEW JERSEY INC.

REQUEST: Provide copies of all written materials (including materials published on a website) that Verizon will make available to callers in response to any inquiry regarding long distance service and identify the individuals, including their title and company, that supervised the creation of the written materials and the company, Verizon, Verizon NJ, or Verizon Long Distance that paid for the production of the written materials.

RESPONSE: Verizon NJ objects to this request on the ground that it is not relevant to this proceeding or reasonably calculated to lead to the discovery of information relevant to the Board's consideration of Verizon's 271 Checklist Compliance in New Jersey. Verizon further objects on the grounds that this request is overly broad and unduly burdensome. Notwithstanding its objections, Verizon states that much of the information requested in this interrogatory has not yet been prepared or determined for the New Jersey LD market.

Attachment 3:

**Verizon Long Distance
Marketing and Sales Agreements
with Verizon New Jersey
and other Verizon BOC and former GTE Affiliates**

verizon

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Verizon Long Distance

Agreement Details:

Title: Marketing and Sales Agreement (NY)

Effective Date: 12/22/99

Provided by: New York Telephone Company (BA-NY)

Provided to: Bell Atlantic Communications, Inc. (BACI)

Details:

None

Terms and Conditions:

Under the terms of this agreement, New York Telephone Company will provide sales, ordering, customer inquiry, customer care, training, verification, and other related services in connection with marketing of BACI long distance services.

Renewal Clause:

Yes

Special Equipment:

None

Rates/Transaction Frequency/OTC* Resources:

*Operating Telephone Company

When used below, the term "TBD" means to be developed. The parties will agree upon TBD rates in writing and New York Telephone will not provide services subject to such rates before written agreements for such rates are signed by the parties.

1. Sales, Ordering and Customer Inquiry Service

| | RA-NY |
|--------------------|---------------------------------------|
| Employees/ Title | Consumer Service Center |
| Number of OTC | 0-3,600 |
| Rate | \$9.23 per contact |
| Pricing Criterion* | FDC** |
| Frequency of | Daily |
| | RA-NY |
| Employees/ Title | Consumer Service Center Sales Support |
| Number of OTC | 0-300 |
| Rate | \$9.23 per contact |
| Pricing Criterion* | FDC** |
| Frequency of | Daily |

2. General Inquiry and Post-Sales Support Service

| |
|--|
| |
|--|

| | |
|--------------------------|-------|
| Pricing Criterion* | FDC** |
| Frequency of Transaction | Daily |

3. Other Services and Functions:

3A. Customer Correspondence

| | |
|--------------------------|---|
| | BA-NY |
| Employees/ Title | Consumer Service Center Sales Support and Order Correction Clerks |
| Number of OTC Employees | 0-300 |
| Rate | \$28.95 per correspondence |
| Pricing Criterion* | FDC** |
| Frequency of Transaction | Daily |

3B. Methods and Procedures and Associated Training Development

| | |
|--------------------------|--|
| | BA-NY |
| Employees/ Title | Consumer Sales & Service Specialist |
| Number of OTC Employees | NA |
| Rate | \$113.63 per hour |
| Pricing Criterion* | FDC** |
| Frequency of Transaction | Occasionally |
| | BA-NY |
| Services | OTC Vendor production, material, supplies, and distribution expenses |
| Number of OTC Employees | NA |
| Rate | Actual OTC vendor cost incurred |
| Pricing Criterion* | Actual OTC vendor cost incurred |
| Frequency of Transaction | Occasionally |

3C. Ongoing Training of Bell Atlantic Personnel

| | |
|--------------------------|---|
| | BA-NY |
| Employees/ Title | Consumer Service Center Representatives |
| Number of OTC Employees | 0-3,600 |
| Rate | \$70.06 per hour (pro-rated in 15 minute increments after 1 hour) |
| Pricing Criterion* | FDC** |
| Frequency of Transaction | Occasionally |
| | BA-NY |
| Employees/ Title | Consumer Service Center Sales Support and Order Correction Clerks |
| Number of OTC Employees | 0 - 300 |
| Rate | \$77.76 per hour (pro-rated in 15 minute increments after 1 hour) |
| Pricing Criterion* | FDC** |
| Frequency of Transaction | Occasionally |
| | BA-NY |
| Employees/ Title | Consumer Service Center Assistant Manager |
| Number of OTC Employees | 0 - 300 |
| Rate | \$78.24 per hour (pro-rated in 15 minute increments after 1 hour) |
| Pricing Criterion* | FDC** |
| Frequency of Transaction | Occasionally |

3D. BACI-Channel Service Order Error Correction

| | |
|--------------------------|--------------|
| | BA-NY |
| Employees/ Title | TBD |
| Number of OTC Employees | TBD |
| Rate | TBD |
| Pricing Criterion* | TBD |
| Frequency of Transaction | TBD |

4. Third Party Verification

| | RA-NY |
|--------------------|------------------------------------|
| Service/ | Third Party Verification/ Consumer |
| Number of OTC | 0-3,600 |
| Rate | \$5.93 per transaction |
| Pricing Criterion* | FDC** |
| Frequency of | Daily |

5. Miscellaneous Expenses: BACI will pay Bell Atlantic all miscellaneous expenses incurred by Bell Atlantic in the provision of services in accordance with the Agreement

| | |
|--------------------------|--------------------------|
| Pricing Criterion* | Actual expenses incurred |
| Frequency of Transaction | Occasionally |

* Services are provided at the higher of the estimated fair market value (EFMV) and Fully Distributed Cost (FDC).

** FDC rates are fully loaded rates, which include the cost of materials and all direct and indirect miscellaneous and overhead costs.

Original Contract

Amendment 1 to Marketing and Sales Agreement (NY)
Amendment 2 to Marketing and Sales Agreement (NY)
Amendment 3 to Marketing and Sales Agreement (NY)
Amendment 4 to Marketing and Sales Agreement (NY)
Amendment 5 to Marketing and Sales Agreement (NY)
Amendment 6 to Marketing and Sales Agreement (NY)
Amendment 7 to Marketing and Sales Agreement (NY)
Amendment 8 to Marketing and Sales Agreement (NY)
Amendment 9 to Marketing and Sales Agreement (NY)
Amendment 10 to Marketing and Sales Agreement (NY)
Amendment 11 to Marketing and Sales Agreement (NY)
Amendment 12 to Marketing and Sales Agreement (NY)
Amendment 13 to Marketing and Sales Agreement (NY)
Amendment 14 to Marketing and Sales Agreement (NY)
Amendment 15 to Marketing and Sales Agreement (NY)
Amendment 16 to Marketing and Sales Agreement (NY)
Amendment 17 to Marketing and Sales Agreement (NY)
Amendment 18 to Marketing and Sales Agreement (NY)
Amendment 19 to Marketing and Sales Agreement (NY)
Amendment 20 to Marketing and Sales Agreement (NY)
Amendment 21 to Marketing and Sales Agreement (NY)
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Amendment 27 - All Jurisdictions
Amendment 28 - All Jurisdictions
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Amendment 31 - All Jurisdictions
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